

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

CHARLES HICKS (AIS# 246241),

Plaintiff,

v.

ALABAMA DEPARTMENT OF  
CORRECTIONS, et al.

Defendants.

\*

\*

\*

\*

\*

CIVIL ACTION NO.  
2:07-CV-668-WHA

**DEFENDANT'S MOTION TO EXTEND TIME**  
**TO FILE SPECIAL REPORT AND ANSWER**

COMES NOW the Defendant, Prison Health Services (hereinafter "PHS") and respectfully requests that this Honorable Court extend the time period which this Defendant has to file its Answer and Special Report in this action by thirty (30) days, up to and including October 4, 2007. As grounds for this Motion, Defendant shows to the Court as follows:

1. A brief extension of time will in no way prejudice any party nor will it unduly delay the adjudication of this matter.

2. The Defendant is in the process of assembling the appropriate records and doing the necessary investigation into this claim in order to properly address all issues within the confines of that Special Report and Answer.

WHEREFORE, all premises considered, this Defendant respectfully requests an extension within which to file its Special Report and Answer, said Special Report and Answer to be filed on or before October 4, 2007.

Respectfully submitted,

/s/ PAUL M. JAMES, JR.

Alabama State Bar Number JAM017

Attorney for Defendant

Prison Health Services, Inc.

RUSHTON, STAKELY, JOHNSTON &  
GARRETT, P.A.

P. O. Box 270

Montgomery, AL 36101-0270

Telephone: (334) 206-3148

Fax: (334) 262-6277

E-mail: [pmj@rsjg.com](mailto:pmj@rsjg.com)

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing has been served by U.S. Mail  
this the 6th day of September, 2007, to:

Charles Hicks (AIS# 246241)  
Alexander City Community Base  
P. O. Drawer 160  
Alexander City, AL 35011

The Clerk of Court, using the CM/ECF system will send notification of this filing to the  
following:

Alabama Department of Corrections  
Legal Division  
P. O. Box 301501  
Montgomery, AL 36130

/s/ PAUL M. JAMES, JR. (JAM017)

Attorney for Defendant

Prison Health Services, Inc.